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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

EPIC GAMES, INC.,
Plaintiff, Counter-Defendant,
v.
APPLE INC.,
Defendant, Counterclaimant.

Case No. 4:20-cv-05640-YGR

Honorable Yvonne Gonzalez Rogers

**DECLARATION OF ERICK
CHANG IN SUPPORT OF
NONPARTY KABAM, INC.'S
ADMINISTRATIVE MOTION TO
SEAL CERTAIN TRIAL EXHIBITS
OF PLAINTIFF EPIC GAMES, INC.**

I, Erick Chang, declare as follows:

1. I am Legal Counsel for Kabam Games, Inc., a wholly-owned subsidiary of Kabam, Inc. ("Kabam"). I am over eighteen years of age. I make this declaration based on my personal knowledge and pursuant to Civil Local Rule 79-5 in support of Kabam's motion to maintain the information described below under seal. If called as a witness, I could and would testify competently to all facts stated herein as follows:

2. Epic Games, Inc.'s Exhibits PX0067 and PX2204 contain highly sensitive, and competitively-valuable information, including, *inter alia*, internal

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DECLARATION OF ERICK CHANG

2. Epic Games, Inc.'s Exhibits PX0067 and PX2204 contain highly sensitive, and competitively-valuable information, including, *inter alia*, internal business strategies and analysis regarding Kabam's user transactions, confidential financial data, as well as private information relating to Kabam's strategic partnerships, the release of which would harm Kabam, a non-party.

3. Specifically, the documents:

- a. reflect confidential, internal proprietary efforts by Kabam to combat fraudulent transactions and future strategies to be implemented regarding same (*see, e.g.*, PX0067, PX2204);
- b. provide confidential details regarding products produced by Kabam that have not yet been publicly launched (*see, e.g.*, PX0067);
- c. reference sensitive and confidential business information, including financial data relating to customer purchases and accounting issues (*see, e.g.*, PX0067, PX2204);
- d. reveal the details of Kabam's strategic partnerships, which could cause harm both to Kabam and its parent company, Netmarble Corp. (*see, e.g.*, PX0067, PX2204); and
- e. contain highly-sensitive gross revenue data, which can be easily calculated by reverse-engineering certain figures therein (*see, e.g.*, PX0067).

4. The public disclosure of Exhibits PX0067 and PX2204 would likely have the effect of causing Kabam substantial competitive harm, and could potentially thwart its efforts to combat fraud, significantly damage its business relationships, and allow public access to some of its most sensitive, propriety data.

5. Kabam restricts dissemination of this information and takes steps to preserve its confidentiality to protect competitive advantage with regard to key distribution platforms.

Erick Chang